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OFFICE OF GENERAL  
COUNSEL  
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www.perkinscoie.com  
2004 NOV 29 A 11: 36

November 29, 2004

**BY HAND DELIVERY**

Mr. Lawrence H. Norton  
Office of the General Counsel  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

**Re: MUR 5552**

Dear Mr. Norton:

On behalf of Kerry-Edwards 2004, Inc. and Robert A. Farmer as Treasurer ("Respondents"), this letter is submitted in response to the complaint filed by Amy Hanmer ("the Complaint") and subsequently labeled MUR no. 5552. The Complaint should be immediately dismissed.

The Commission may find "reason to believe" only if a complaint sets forth sufficient specific facts, which, if proven true, would constitute a violation. *See* 11 C.F.R. §§ 111.4(a), (d) (2004). Unwarranted legal conclusions from asserted facts or mere speculation will not be accepted as true, and provide no independent basis for investigation. *See* Commissioners Mason, Sandstrom, Smith and Thomas, Statement of Reasons, MUR 4960 (Dec. 21, 2001).

The complaint alleges that yard signs created by Respondents that appeared in the state of Ohio did not contain the sponsorship disclaimer required by federal law. Yet it identifies "no source of information that reasonably gives rise to a belief in the truth of the allegations presented." *Id.* There is no evidence that Respondents had any role in the creation or distribution of the photographed yard sign.

*In fact, Respondents were not the source of the yard signs in question, nor did they have any knowledge of, or role in, the creation or distribution of the signs. The photographs in the complaint clearly indicate that the signs were created and distributed by "Demstore.com." As the attached webpage demonstrates, identical yard signs are still available for sale on <http://www.demstore.com>. Individuals and*

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organizations are able to purchase these signs directly from Demstore.com. A "WHOIS" search of this website reveals that it was registered to, and is administered by, Steven Schwat of Washington Promotions, Inc., P.O. Box 71007, Chevy Chase, Maryland 20813.

Because the Complaint relies entirely on conclusory allegations against Respondents not supported by the facts, Respondents respectfully request that the Commission dismiss the complaint.

Very truly yours,

 1/5/

Marc E. Elias

Counsel to Kerry-Edwards 2004, Inc.

Robert A. Farmer, Treasurer

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**Store Front****Kerry Victory Signs™**
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 (Includes All Items)
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Categories**

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[Bumper Stickers](#)  
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See for yourself how durable and easy these campaign yard signs are to set up.

**Note:** Shipping fees will be estimated and a customer service agent will contact you within 24 hrs with the exact fees.

**As Low As \$0.95 ea. With**

- **Standard Kerry Victory**
- **Custom Kerry Victory**  
(Imprinted with your message)

**Both Victory Sign Styles 100% USA & Union Printed!**

**Kerry/Edwards Victory Yard Signs**
**Kerry/Edwards  
Campaign Victory  
Yard Signs**

Environmentally friendly, lighter weight, longer lasting, easier to install and lower cost

than cardboard signs. They are made in the USA, Union printed, made without paper or trees and are 100% recyclable. Signs are 14½" x 22". Order with or without the frame. Frames are 20" x 33".

SKU: 24-0008-00 (sign)  
 SKU: 24-0008-01 (sign w/ frames)

	1	10	25	100
Sign w/ Frame	\$3.00	\$2.75	\$2.50	\$2.00
Sign Only	\$2.00	\$1.75	\$1.50	\$1.25

	500	1,000	2,500	5,000	10,000
Sign w/ Frame	\$1.60	\$1.35	\$1.10	\$1.00	\$0.95
Sign Only	\$1.00	\$0.80	\$0.70	\$0.65	\$0.60

**Note:** Orders signs have the shipped separate arrive 2-3 day signs, if the or shipment.

Larger Quantity

☐ **Signs w/ Frames**  
**Qty:**

**Coordinated Campaigns and State Heads**

Please take note, these signs are significantly less than cardboard signs, cost less to ship, are easier to distribute and include the frame to set it up. Each and every sign includes a reusable wire frame so more signs will get out on the lawns of supporters.

**Fact:** More signs make it outside - because our Victory Signs™ are delivered with reusable wire frames, included in the very low cost, more signs make it outside the campaign yard. That means fewer signs sitting on the floor in the campaign office.

**Drop Ship Option:** We can also drop ship signs for you. We can drop ship as one sign per address to thousands. Just ask us.

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Larger Quantities: [contact us](#).

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**Note:** Wire frames shipped separately. They may arrive 2-3 days apart from the signs, if the order is a ground shipment.

Not exactly what you are looking for? See our [custom victory sign](#) section.

☐ Qty:

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**Victory Yard Signs™ Most Cost Effective Yard Sign Made★ Cost Less, Even with Frame Incl**

All campaign merchandise is provided by DemStore.com, an independent company not affiliated with the John Kerry for President Car

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All sales are final

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Using our Whois utility allows the public to see who is the owner(the "r" well as other information about the domain name. Some of this inform. RegisterFly.com (the "registrar") and some is maintained by the "regist

**Whois Database Lookup**

Enter the domain name to lookup:

Domain Name: demstore.com

**demstore.com is registered at whois.itsyourdomain.com**

The Data in our WHOIS database is provided by us for and to assist persons in obtaining information about name registration record. We do not guarantee its a submitting a WHOIS query, you agree that you will use lawful purposes and that, under no circumstances will (1) allow, enable, or otherwise support the transmis. commercial advertising or solicitations via e-mail (. high volume, automated, electronic processes that ap systems, or our customers. We reserve the right to any time. By submitting this query, you agree to ab

Domain: demstore.com

Registrant

Washington Promotions, Inc.  
sedwards@MACMANNES.COM  
P.O. Box 71007  
Chevy Chase, MD 20813 US

Administrative

Steven Schwat  
Washington Promotions and Printing  
steve@schwat.net  
P.O. Box 71007  
Chevy Chase, MD 20813 US  
+1.3016516880

Billing

Steven Schwat  
Washington Promotions and Printing  
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Chevy Chase, MD 20813 US

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13422 215th Ave E  
Sumner, WA 98390 US  
+1.3608972106

Record created on January 31, 2000  
Record last updated on February 17, 2004  
Record expires on January 31, 2010  
Domain Name Servers:  
NS1.WEBXESS.NET  
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